

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

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	:	Chapter 9
In re	:	
	:	Case No. 13-53846
CITY OF DETROIT, MICHIGAN,	:	
	:	Hon. Steven W. Rhodes
Debtor	:	
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**STIPULATION FOR WITHDRAWAL OF
SATISFIED CLAIM OF ALLEN SYSTEMS GROUP, INC.**

Allen Systems Group, Inc. (“Allen Systems”) and the City of Detroit, Michigan (the “City”), by and through the undersigned, stipulate as follows in support of the entry of the *Order Withdrawing Satisfied Claim of Allen Systems Group, Inc.* attached hereto as **Exhibit 1**.

1. On December 16, 2013, Allen Systems filed its proof of claim [Claim No. 233] (the “Claim”) in the amount of \$228,204.

2. Of that total amount, \$114,102 related to post-petition invoices, which were not properly included in the Claim.

3. The remaining \$114,102 of the Claim amount represented a pre-petition general unsecured claim.

4. In the ordinary course of its business, the City has paid Allen Systems all of the pre-petition amounts sought in the Claim.

4. Allen Systems hereby withdraws the Claim in its entirety because the Claim has been fully satisfied.

4. Nothing in this Stipulation or the proposed order attached hereto as Exhibit 1 addresses any post-petition claims which have arisen or may arise between the City and Allen

Systems. Both parties fully reserve all of their respective rights with respect to any post-petition claims.

WHEREFORE the parties respectfully request that the Court enter an order in the form attached hereto as **Exhibit 1** withdrawing the Claim.

Respectfully submitted by:

ALLEN SYSTEMS GROUP, INC.	FOLEY & LARDNER, LLP
By: <u>/s/ Jennifer T. Sheffield</u> Jennifer T. Sheffield 708 Goodlette Road North Naples, FL 34102 Phone: (239) 435-2365 jennifer.sheffield@asg.com <i>Counsel to Allen Systems Group, Inc.</i>	By: <u>/s/ Jeffrey S. Kopp</u> Jeffrey S. Kopp (P59485) John A. Simon (P61866) Tamar N. Dolcourt (P73425) 500 Woodward Ave., Ste. 2700 Detroit, MI 48226 Phone: (313) 234-7100 jkopp@foley.com jsimon@foley.com tdolcourt@foley.com <i>Counsel to the City of Detroit, Michigan</i>

Dated: January 15, 2015